

Juli E. Farris (CSB No. 141716)
jffarris@kellerrohrback.com
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Telephone: (206) 623-1900
Facsimile: (206) 623-3384

Attorneys for Lead Plaintiff Gerald del Rosario

Susan S. Muck (CSB No. 126930)
smuck@fenwick.com
FENWICK & WEST LLP
555 California Street, Suite 1200
San Francisco, CA 94104
Telephone: (415) 875-2300
Facsimile: (415) 281-1350

*Attorneys for Defendants Uzia Galil, Raymond
A. Burgess, James D. Meindl, James B. Owens,
Jr., and Arthur B. Stabenow*

Steven S. Kaufhold (CSB No. 157195)
skaufhold@akingump.com
**AKIN GUMP STRAUSS HAUER & FELD
LLP**
580 California, Suite 1500
San Francisco, CA 94101
Telephone: (415) 765-9500
Facsimile: (415) 765-9501

*Attorneys for Nominal Defendant Zoran
Corporation*

John C. Dwyer (CSB No. 136533)
dwyerjc@cooley.com
COOLEY GODWARD KRONISH LLP
Five Palo Alto Square
3000 El Camino Real
Palo Alto, CA 94306
Telephone: (650) 843-5000
Facsimile: (650) 857-0663

Attorneys for Defendant Levy Gerzberg

John Hemann (CSB No. 165823)
jhemann@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 95104
Telephone: (415) 442-1000
Facsimile: (415) 442-1001

Attorneys for Defendant Karl Schneider

Sara B. Brody (CSB No. 130222)
sara.brody@hellerehrman.com
HELLER EHRMAN LLP
333 Bush Street
San Francisco, CA 94104
Telephone: (415) 772-6000
Facsimile: (415) 772-6268

Attorneys for Defendant Camillo Martino

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE ZORAN CORPORATION
DERIVATIVE LITIGATION

No. CV 06-05503 WHA

DERIVATIVE ACTION

This Document Relates To:

ALL ACTIONS

**STIPULATION AND ~~[PROPOSED]~~
ORDER EXTENDING FACT
DISCOVERY DEADLINE BY TWO
WEEKS**

1 WHEREAS, counsel for the Parties have conferred regarding the schedule in this Action;
2 WHEREAS, Fed. R. Civ. P. 30(a) limits each Party to 10 depositions, absent stipulation
3 or leave of Court;

4 WHEREAS, Plaintiff to date has taken or scheduled 13 depositions, including non-party
5 witnesses, and the Parties have stipulated that Plaintiff may exceed the prescribed limit of
6 depositions to take those depositions;

7 WHEREAS, Plaintiff seeks to depose an additional four witnesses – David Rynne, James
8 Meindl, James Owens, and Phil Young – and also seeks to continue the deposition of Raymond
9 Burgess, who was previously deposed;

10 WHEREAS, the Parties have agreed that Plaintiff may take the depositions of Messrs.
11 Meindl, Owens and Burgess, and are in negotiations over date, location, method, and duration of
12 these depositions;

13 WHEREAS, the Parties have also exchanged written discovery requests, including
14 interrogatories, responses to which are due shortly;

15 WHEREAS, pursuant to the Court's April 21, 2008 Order, the current deadline for
16 completion of fact discovery is May 30, 2008;

17 WHEREAS, the Parties agree that a two-week extension of the discovery deadline is
18 needed to facilitate the scheduling and orderly completion of depositions and written discovery;

19 WHEREAS, no other dates will be affected by this Stipulation if approved by the Court;

20 NOW, THEREFORE, the Parties hereby stipulate that the time period for the Parties to
21 complete fact discovery will be extended by two weeks until June 13, 2008.

22
23 May 15, 2008

/s/ Juli E. Farris

Juli E. Farris (CA Bar No. 141716)
jfarris@kellerrohrback.com
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Telephone: (206) 623-1900
Facsimile: (206) 623-3384

Attorneys for Lead Plaintiff Gerald del Rosario

May 15, 2008

/s/ Susan S. Muck

Susan S. Muck (CSB No. 126930)

smuck@fenwick.com

FENWICK & WEST LLP

555 California Street, Suite 1200

San Francisco, CA 94104

Telephone: (415) 875-2300

Facsimile: (415) 281-1350

*Attorneys for Defendants Uzia Galil, Raymond A. Burgess,
James D. Meindl, James B. Owens, Jr., and Arthur B.
Stabenow*

May 15, 2008

/s/ Steven S. Kaufhold

Steven S. Kaufhold (CSB No. 157195)

skaufhold@akingump.com

AKIN GUMP STRAUSS HAUER & FELD LLP

580 California, Suite 1500

San Francisco, CA 94101

Telephone: (415) 765-9500

Facsimile: (415) 765-9501

Attorneys for Nominal Defendant Zoran Corporation

May 15, 2008

/s/ John C. Dwyer

John C. Dwyer (CSB No. 136533)

dwyerjc@cooley.com

COOLEY GODWARD KRONISH LLP

Five Palo Alto Square

3000 El Camino Real

Palo Alto, CA 94306

Telephone: (650) 843-5000

Facsimile: (650) 857-0663

Attorneys for Defendant Levy Gerzberg

May 15, 2008

/s/ John Hemann

John Hemann (CSB No. 165823)

jhemann@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP

One Market, Spear Street Tower

San Francisco, CA 95104

Telephone: (415) 442-1000

Facsimile: (415) 442-1001

Attorneys for Defendant Karl Schneider

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/s/ Sara B. Brody
Sara B. Brody (CSB No. 130222)
sara.brody@hellerehrman.com
HELLER EHRMAN LLP
333 Bush Street
San Francisco, CA 94104
Telephone: (415) 772-6000
Facsimile: (415) 772-6268

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PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED.

DATED: May 20, 2008

Honorable
United States

